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October 11, 2022

Hon. Ronnie Abrams United States District Court U.S. Courthouse 40 Foley Square New York, New York 10007

Application granted.

SO OREDERED.

Re: United States v. Ortega, et al S3 22 Cr. 91 (RA)

Ronnie Abrams, U.S.D.J.

October 11, 2022

Dear Judge Abrams:

I am the assigned CJA counsel for defendant **Josefina Marine** in the above referenced case. I write today to respectfully request authorization for the expenditure of CJA funds to retain the services of Clara S. Kalhous, Esq. as associate counsel to assist me in defending Ms. Marine. Ms. Kalhous has assisted several S.D.N.Y. counsels, including me, in the past as an associate counsel. This past October Ms. Kalhous served as associate counsel to me in a trial before Judge Preska (<u>United States v. Adelekan</u>, 19 Cr. 291 (LAP)) and her assistance was first rate. Ms. Kalhous is experienced and adept at reviewing digital discovery, preparing legal memoranda and preparing for and assisting at trial and appellate practice. Ms. Kalhous would be a valuable addition to the defendant's defense.

Should Your Honor be inclined to grant this application it is respectfully requested that Ms. Kalhous be approved at the rate of \$110.00 per hour for an initial period of 40 hours with leave to request additional funding should the need arise. Of course, every effort will be made to avoid duplication of the work load.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,

Richard H. Rosenberg

cc.: Clara Kalhous, Esq.